

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

Case No. 2:12-md-02323-AB

MDL No. 2323

The Honorable Anita B. Brody

Kevin Turner and Shawn Wooden, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

National Football League and NFL Properties
LLC, successor-in-interest to NFL Properties,
Inc.,

Defendants.

THIS DOCUMENT RELATES TO: ALL
ACTIONS

**DECLARATION OF PATRICK PREECE IN SUPPORT OF
THE MOTION OF WALKER PRESTON CAPITAL HOLDINGS, LLC
TO INTERVENE FOR THE LIMITED PURPOSE OF OPPOSING ON
JURISDICTIONAL GROUNDS CO-LEAD CLASS COUNSEL'S MOTION TO
(1) DIRECT CLAIMS ADMINISTRATOR TO WITHHOLD ANY PORTIONS OF
CLASS MEMBER MONETARY AWARDS PURPORTEDLY OWED TO CERTAIN
THIRD-PARTY LENDERS AND CLAIMS SERVICES PROVIDERS, AND (2) DIRECT
DISCLOSURE TO CLAIMS ADMINISTRATOR OF EXISTENCE OF CLASS
MEMBER AGREEMENTS WITH ALL THIRD PARTIES**

I, Patrick Preece, hereby declare as follows:

1. I am one of the founding members of Proposed Intervenor, Walker Preston Capital Holdings, LLC ("Walker Preston").
2. I submit this Declaration in support of the Motion of Walker Preston Capital Holdings, LLC to Intervene for the Limited Purpose of Opposing on Jurisdictional Grounds Co-Lead Class Counsel's Motion to (1) Direct Claims Administrator to Withhold Any Portions of

Class Member Monetary Awards Purportedly Owed to Certain Third-Party Lenders and Claims Services Providers, and (2) Direct Disclosure to Claims Administrator of Existence of Class Member Agreements With All Third Parties (the “Motion To Withhold Funds”).

3. Walker Preston was organized in April 2014 as a Delaware holding company, with its principal place of business located at 8 Driftwood Landing Road, Gulf Stream, Florida 33483.

4. The members of Walker Preston are JDT Holdings, LLC, Sandeep Srinath and myself.

5. Walker Preston does no business in and has no contacts with the Commonwealth of Pennsylvania.

6. Walker Preston formed the following three wholly owned subsidiaries in April 2014:

- Ludus Capital, LLC, a Florida limited liability company;
- MCA Capital, LLC, a Florida limited liability company;
- Aureus Capital, LLC, a Florida limited liability company.

7. Ludus was in the business of providing funding to professional athletes related to their contract rights.

8. MCA Capital was in the business of providing funding to companies that engaged in so called “merchant cash advance” transactions and participated in syndications of those transactions. It was dissolved in January 2017 after selling all of its remaining assets.

9. Aureus Capital was organized with the intent to provide funding for certain precious metal trading activities. Aureus never did any business and was dissolved it in February 2016.

10. Originally, Ludus provided funding to athletes secured by existing contract rights unrelated to the NFL concussion litigation. Beginning in the summer of 2014, Ludus originated transactions with athletes possessing NFL concussion claims (the "Ludus Deals"). In addition, in the summer of 2014 Ludus purchased 90% of the contractual rights in six funding agreements originated by Joe Montgomery/Montgomery Holdings of Ohio (the "Mhool Deals"). Two of the athletes who were parties to the original Mhool Deals contacted Ludus for additional funding, which Ludus provided after the acquisition of the Mhool Deals (the "Additional Deals").

11. Ludus, thereafter, sold the Ludus Deals to Peachtree Funding Northeast, LLC.

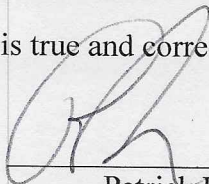
12. Ludus was dissolved in September 2016 after assigning the Mhool Deals and the Additional Deals to its parent, Walker Preston.

13. To my knowledge, no complaint or assertion of a problem has been received from or on behalf of any of the athletes (or any of their representatives) who entered into the Mhool Deals, the Additional Deals or the Ludus Deals.

14. On October 23, 2017, co-lead class counsel emailed to attorney Ricardo Reyes a copy of the Motion To Withhold Funds. Mr. Reyes, an attorney based in Florida, was not authorized to accept service of the Motion To Withhold Funds on Walker Preston's behalf, nor did co-lead class counsel ask if service in such a manner would be accepted by Walker Preston.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: November 16, 2017



Patrick Preece